

# NORTH AMERICAN GALVANIZING COMPANY

ARC/M/ENSV  
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APR 09 1999

## CORPORATE OFFICE:

2250 EAST 73rd STREET, SUITE 300 • TULSA, OKLAHOMA 74136-6832 • (918) 488-9420 • FAX (918) 488-8172

April 8, 1999

VIA UPS OVERNIGHT

Dedriel Newsome  
U.S. EPA, Region VII  
25 Funston Road  
Kansas City, KS 66115

Dear Dedriel Newsome:

This letter is in response to the Notice of Violation (NOV) issued to North American Galvanizing Co. - St. Louis on 3/26/99. The corrective actions for each citation are addressed below (citations are numbered the same as on the NOV).

1. The caustic liquid solution is not a solid waste because it is not discarded. North American Galvanizing has sampled the caustic sludge, caustic rinse sludge, and refractory bricks. Hazardous waste determinations will be made based on these sampling results. All documentation, including the sampling procedures used, will be forwarded to your office on or before May 28, 1999. North American Galvanizing has implemented a policy following the guidelines of the Missouri Department of Natural Resources Technical Assistance Program on used oil filters (a copy of the guidelines is enclosed with the procedure we will follow highlighted). Two follow up internal audits will be performed by North American Galvanizing in June and October of this year to check for proper implementation by maintenance personnel. Also, a sign with the proper procedures will be placed in the area where the filters are handled. Since North American Galvanizing only generates lamps on an infrequent basis, we will continue to dispose of these in a Missouri sanitary landfill. North American Galvanizing will follow the guidelines established by the MDNR and highlighted in the attached guidance document. A sign on these procedures will be placed in the office to remind personnel of the proper disposal method.
2. The zinc skimmings and dross are sent to Zinc Corporation of America under contract. Both products are used to produce prime western zinc and commercial zinc oxide. Therefore, neither is a solid waste. A copy of a letter from ZCA stating the end products made from this material will follow in a separate mailing and will be kept on file at the St. Louis facility.
3. North American Galvanizing has begun putting the Missouri generator ID# on hazardous waste manifests. A detailed instruction sheet will be placed where the manifests are filled out.
4. North American Galvanizing has begun putting consecutive shipment numbers on hazardous waste manifests in the space labeled "Missouri Manifest Document Number."

Denver, CO 80022  
4400 E. 61st Ave.  
(303) 288-6631  
FAX (303) 288-0726

Houston, TX 77041  
5910 Cunningham Rd.  
(713) 937-3880  
FAX (713) 937-1641

Hurst (DFW), TX 76053  
625 W. Hurst Blvd.  
(817) 268-2414  
FAX (817) 282-7793

Kansas City, MO 64126  
7700 E. 12th  
(816) 241-4300  
FAX (816) 241-4303

Louisville, KY 40214  
6310 Kenjoy Drive  
(502) 367-6146  
FAX (502) 368-9653

Nashville, TN 37209  
200 32nd Avenue N.  
(615) 297-9581  
FAX (615) 297-9582

St. Louis, MO 63132  
1461 Kinark Court  
(314) 993-1562  
FAX (314) 993-3556

Tulsa, OK 74107  
Plant #1  
1800 W. 21st Street  
(918) 584-0303  
FAX (918) 584-1781

Tulsa, OK 74107  
Plant #2  
2506 W. 26th  
(918) 584-6668  
FAX (918) 584-5130

Tulsa, OK 74107  
Spin Galv  
2302 South Union  
(918) 584-7746  
FAX (918) 584-7747

Catoosa, OK 74015  
RSI  
5101 Bird Creek Avenue  
(918) 266-6565  
FAX (918) 266-6566



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APR 27 1999



R00141790

RCRA RECORDS CENTER

April 8, 1999

North American Galvanizing will use the year and sequential numbers, for example: 990001, 990002, etc. for this year. This procedure and a log sheet of the shipment numbers will be part of the detailed instruction sheet mentioned in number 3.

5. North American Galvanizing has begun putting the transporters license plate number on all hazardous waste manifests. This procedure will be included on the detailed instruction sheet mentioned in number 3.
6. North American Galvanizing has begun putting the specific gravity on hazardous waste manifests when using gallons for the amount. This procedure is included on the detailed instruction sheet mentioned in number 3.
7. A Waste Analysis Plan is being developed for the preflux filter cake. The plan will include representative sampling of the waste and will be maintained on-site. North American Galvanizing will submit a copy of the plan to your office on or before May 28, 1999.

If you have any questions, please contact me at the St. Louis facility or Kevin Halstead at our corporate office. North American Galvanizing would like to thank you for your assistance in this matter.

Sincerely,



Eddie Sloan  
Plant Manager

cc: Kevin Halstead - Senior Process Engineer  
Craig Schaal - Region 2 General Manager

1461 KinArk Court, ST Louis, MO 63132. 314-8931562 - Phone  
314-893-3556 -Fax

**North American  
Galvanizing**

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APR 15 1999

# Fax

**To:** Dedriel Newsome

**From:** Eddie Sloan

**Fax:** 913-551-5218

**Pages:** 5

**Phone:** 913-551-5058

**Date:** 4/15/99

**Re:**

**CC:**

☐ Urgent    ☒ For Review    ☐ Please Comment    ☐ Please Reply    ☐ Please Recycle

Dedriel,

If you have any questions please do not hesitate to contact me.

Thanks,

Eddie

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APR 27 1999

RESP

## **FLUORESCENT BULB DISPOSAL PROCEDURES**

- 1) Place the burned out bulb in the box the replacement bulb came in. When the box becomes full secure the box and wrap completely with shrink-wrap. Be sure to wrap the box several times to ensure protection of the bulbs.**
- 2) Place the shrink-wrapped box in the trash dumpster being careful not to break the bulbs.**

## **HAZARDOUS WASTE MANIFEST PROCEDURES**

- 1) Each manifest shall have a sequential number assigned to it. The Plant Manager or the Plant Superintendent will assign the number. The number will be placed in the upper right hand space marked MISSOURI MANIFEST DOCUMENT NUMBER.**
- 2) Each manifest shall have the license plate number of the transporting vehicle written on the manifest in space 7, titled TRANSPORTER 2 COMPANY NAME.**
- 3) Each manifest shall have the specific gravity written on it in location B. Based on an average of all 1998 loads the specific gravity is 1.418.**

## **USED OIL FILTER DISPOSAL PROGRAM**

- 1) Let forklift run until running temperature has been reached.**
- 2) Remove filter**
- 3) Puncture filter on the dome end and let drain for two weeks**
- 4) Discard**

APR 13 '99 12:37PM NORTH AMERICAN GALV

P.1



ZINC CORPORATION OF AMERICA  
300 FRANKFORT ROAD MONACA, PA 15061-2286

(724) 774-1020

March 31, 1999

Mr. Kevin Halstead  
North American Galvanizing Company  
2250 East 73<sup>rd</sup> Street, Suite 300  
Tulsa, OK 74136-6832

Dear Kevin:

In response to your request, this confirms that the galvanizer's skimmings and bottom dross which we receive from North American's plants at Louisville, Nashville, St. Louis, Kansas City, Tulsa and RSI (Port of Catoosa) are treated in our Monaca, PA plant to produce prime western grade zinc metal and commercial zinc oxide.

Sincerely,

A handwritten signature in black ink that reads 'T.A. Theobald'. The signature is written in a cursive, flowing style.

T.A. Theobald  
Commercial Manager